

# Amended EXHIBIT F

**PLAINTIFF JOE ANDREW SALAZAR'S AMENDED UPDATED  
DEPOSITION DESIGNATIONS AND HTC CORPORATION'S  
OBJECTIONS AND COUNTER DEPOSITION DESIGNATIONS**

Pursuant to Federal Rule of Civil Procedure 26(a)(3) and the Court's Eighth Amended Docket Control Order (Dkt. 212), Plaintiff Joe Andrew Salazar ("Salazar") hereby submits the following designations from the depositions of those witnesses whose testimony Salazar expects to present at trial by deposition, or may present by deposition if the need arises.

These deposition designations do not identify those witnesses whose testimony Salazar may choose to counter-designate, and Salazar hereby reserves the right to counter-designate the testimony of any witness whose deposition testimony is designated by Defendant HTC Corporation ("HTC") and/or proffered by HTC at trial. Likewise, these deposition designations do not include deposition testimony that Salazar may use to cross-examine any witness called at trial, and Salazar hereby reserves the right to use deposition testimony to cross-examine and/or impeach any witness called live or by deposition at trial by any party, regardless of whether that witness's testimony is designated herein. Salazar further reserves the right to present witnesses by deposition and designate their deposition testimony in the event that they become unavailable for trial.

In addition, Salazar reserves the right to amend and/or supplement these Deposition Designations to add or delete deposition testimony as allowed by the Court and law, including to add rebuttal and/or counter-designations, and counter-counter designations, as contemplated by the Court's Eighth Amended Docket Control Order (Dkt. 212), in rebuttal to HTC's case, arguments or evidence, for purposes of authenticating evidence, and/or in response to any deposition testimony designated or counter-designated by HTC. Salazar notes that his designation of any deposition testimony herein is not an admission that such testimony would be admissible if

proffered by HTC and Salazar reserves the right to withdraw or choose not to offer the designated deposition testimony, in whole or in part.

At this time, Salazar identifies the following deposition designations in alphabetical order:

*[continued on next page]*

**PLAINTIFF JOE ANDREW SALAZAR'S AMENDED UPDATED DEPOSITION DESIGNATIONS**

<b>Deponent</b>	<b>Date of Deposition</b>	<b>Salazar's Initial Designations</b>	<b>HTC's Objections</b>	<b>HTC's Counter-Designation</b>	<b>Salazar's Objections</b>	<b>Salazar's Counter-Counter Designations</b>	<b>HTC's Objections</b>
Blok, Justin	January 24, 2018						
Ho, Chia Chu	December 1, 2017	17:9 – 19:15	18:1-9 – 401/402; 403				
			18:22-19:3 – objectionable as compound				
				7:22-24			
				8:3-22			
				8:24			
Gottesman, Oded	February 19, 2018						
Griffin, Roy	January 23, 2018						
Griffin, Roy	February 9, 2018						
Lai, Hsiu Fen	December 1, 2017	11:1 – 18:25	11:1-12:9 – 401/402; 403				
			13:15-15:13 – 401/402, 403				
			18:1-7 – 401/402, 403				
			18:18-25 – 401/402, 403				
				7:16-23		20:11-17	Compound, Beyond the Scope
				12:13-15		26:20-37:4	28:16-29:5 – 401/402, 403
				15:14-20			29:16-17 – 401/402, 403
				15:22			29:18-21 – Vague

Deponent	Date of Deposition	Salazar's Initial Designations	HTC's Objections	HTC's Counter-Designation	Salazar's Objections	Salazar's Counter-Counter Designations	HTC's Objections
				19:18-21			30:22-31:5 – 401/402, 403, Vague, Compound
				19:23-25			31:20 – 31:22 – Compound
				20:3-6			31:23-32:1 – 401/402, 403
				20:8-10			32:20-33:5 – Compound
				22:15-23:11			34:8-34:15 – Vague, 401/402, 403
				24:13-15			34:16-20 – Vague, 401/402, 403, Misstates prior testimony
				26:9-18			34:21-35:6 – Vague
				26:22-25		38:24-48:21	38:24-39:14 – Vague, 401/402, 403
				27:10-15			39:14-21 - Compound
				27:17-19			39:22-40:18 – 401/402, 403, Vague, Assumes Facts Not in Evidence

Deponent	Date of Deposition	Salazar's Initial Designations	HTC's Objections	HTC's Counter-Designation	Salazar's Objections	Salazar's Counter-Counter Designations	HTC's Objections
				27:23-28:1			41:16-42:5 – 401/402, 403, Subject to HTC MIL 2C
				28:6-12			42:19-43:1 – 401/402, 403
				29:2-5			
				36:14-15			
				36:17-23			
				45:6-13	401/402		
				45:22-46:7	401/402		
				46:15-17	401/402		
				46:19-21	401/402		
				46:25-47:1	401/402		
				47:3-48:19	401/402		
		20:24-22:4					
		22:15-23:11					
Lam, Vincent	March 22, 2018						
Muthukumarasamy, Sivasubramanian	January 8, 2018	25:7-29:21	25:7 – 401/402; 403; objectionable as only an answer without a question				
			25:19-23 – objectionable as vague and ambiguous and withdrawn/ stricken				

Deponent	Date of Deposition	Salazar's Initial Designations	HTC's Objections	HTC's Counter-Designation	Salazar's Objections	Salazar's Counter-Counter Designations	HTC's Objections
			26:5-25 – 401/402; 403; objectionable as vague and ambiguous and as compound; no answer				
			27:21-28:3 – 401/402; objectionable as compound and vague and ambiguous; no answer				
				8:14-12:25	401/402, 602F, 602P, VA		
				13:20-18:8	401/402, 602F, 602P, VA, LC		
				20:5-7			
				20:11-13			
				20:20-23			
				27:2-3			
				27:5-20			
				28:5-11			
				28:13-16			
Meyers, Robert	December 21, 2017						

Deponent	Date of Deposition	Salazar's Initial Designations	HTC's Objections	HTC's Counter-Designation	Salazar's Objections	Salazar's Counter-Counter Designations	HTC's Objections
Salazar, Joe Andrew	December 20, 2017						
Wei, Tung Shan	December 1, 2017						
Wolfe, Andrew	January 31, 2018						
Ho, Chia Chu "Robbie" and Wu, Chih Chung "Brian"	March 30, 2018 (March 29, 2018 EST)	23:1-20	23:4-17 – 401/402; 403; HTC's MIL #II.C (discovery conduct/ disputes)				
		23:21-24:17	401/402; 403; objectionable as vague and ambiguous; HTC's MIL #II.C (discovery conduct/ disputes)				
		24:18-26:24	24:18-25:12 – 401/402; 403; objectionable as improper narrative by counsel  25:20-21 – 401/402				



Deponent	Date of Deposition	Salazar's Initial Designations	HTC's Objections	HTC's Counter-Designation	Salazar's Objections	Salazar's Counter-Counter Designations	HTC's Objections
			26:5-24 – 602; objectionable as vague and ambiguous; outside scope of 30(b)(6)  26:10-20 – 401/402; 403				
		28:18-25	objectionable as vague and ambiguous; HTC's MIL #II.C (discovery conduct/ disputes)				
		32:18-33:1	32:18-33:1 - objectionable as vague and ambiguous; HTC's MIL II.C (discovery conduct/ disputes)  32:18-19 – 401/402; 403				
		33:2-9	outside the scope				

Deponent	Date of Deposition	Salazar's Initial Designations	HTC's Objections	HTC's Counter-Designation	Salazar's Objections	Salazar's Counter-Counter Designations	HTC's Objections
		33:10-19	33:10-19 – objectionable as argumentative and mischaracterizes the witness' prior testimony; HTC's MIL II.C (discovery conduct/ disputes)				
		34:18-35:6	34:18-21 – objectionable as vague and ambiguous  34:22-34:25 – 401/402, 403  35:3-6 – 401/402; objectionable as vague and ambiguous and argumentative				

Deponent	Date of Deposition	Salazar's Initial Designations	HTC's Objections	HTC's Counter-Designation	Salazar's Objections	Salazar's Counter-Counter Designations	HTC's Objections
		46:22-25	401/402; outside the scope				
		47:5-15	47:5-9 – 401/402/ 403; objectionable as argumentative and improper narrative by counsel  47:13-15 – 401/402; 403				
		48:12-49:4,	48:12-14 – outside the scope; HTC's MIL II.C (discovery conduct/ disputes)  48:15-49:1 – 401/402; 403; HTC's MIL II.C (discovery conduct/ disputes)  49:2-4 – outside the				

Deponent	Date of Deposition	Salazar's Initial Designations	HTC's Objections	HTC's Counter-Designation	Salazar's Objections	Salazar's Counter-Counter Designations	HTC's Objections
			scope; HTC's MIL II.C (discovery conduct/ disputes)				
		49:23-51:5	49:23-50:4 – 401/402; objectionable as vague and ambiguous; outside the scope; HTC's MIL II.C (discovery conduct/ disputes)  50:5-8 – objectionable as argumentative ; 401/402; 403; outside the scope; HTC's MIL II.C (discovery conduct/ disputes)  50:9-16 – 401/402;				

Deponent	Date of Deposition	Salazar's Initial Designations	HTC's Objections	HTC's Counter-Designation	Salazar's Objections	Salazar's Counter-Counter Designations	HTC's Objections
			objectionable as vague and ambiguous; outside the scope; HTC's MIL II.C (discovery conduct/ disputes)  50:17-51:5 – 401/402; 403; 401/402; outside the scope; HTC's MIL (discovery conduct/ disputes)				
				44:17-19			
				44:25-45:9			
				45:11-12			
				56:5-8	Improper Leading Question (LQ)		
				56:10-14	LQ		
				56:16-20	LQ		
				56:22-57:1	LQ		
				57:10-21	LQ		
				57:23-58:2	LQ		
				58:4-10	LQ		
				58:12-15	LQ		

Deponent	Date of Deposition	Salazar's Initial Designations	HTC's Objections	HTC's Counter-Designation	Salazar's Objections	Salazar's Counter-Counter Designations	HTC's Objections
				59:13-59:17	LQ		
				59:19-22	LQ		
				59:24-60:3	LQ		
				60:9-14	LQ		
				60:17-24	LQ		
				61:1-8	LQ		
				61:10-15	LQ		
				61:17	LQ		
				61:19 - 25	LQ		
				62:5-8	LQ		
				62:15-20	LQ		
				63:3-7	LQ		
				63:9	LQ		